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Attorneys for Defendants
IRICO GROUP CORP. AND
IRICO DISPLAY DEVICES CO., LTD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No.: 07-cv-05944 JST

MDL No. 1917

This document relates to:

ALL ACTIONS

**DECLARATION OF GERALDINE W.
YOUNG IN SUPPORT OF IRICO
DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL EXHIBITS TO
OBJECTIONS TO SPECIAL MASTER'S
REPORT AND RECOMMENDATION
PURSUANT TO CIVIL LOCAL RULES 7-
11 AND 79-5**

1 I, Geraldine W. Young, declare as follows:

2 1. I am a member of the bar of the State of Texas and admitted *pro hac* vice in this
3 matter. I am an attorney with Norton Rose Fulbright US LLP, which represents Defendants Irico
4 Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Irico Defendants’ Administrative Motion to Seal Record Pursuant to Civil Local Rules 7-11 and
7 79-5(f) (the “Motion”).

8 2. Except for those matters stated on information and belief, about which I am
9 informed and which I believe to be true, I have personal knowledge of the facts set forth herein
10 and, if called upon, could and would competently testify thereto under oath.

11 3. Pursuant to Civil Local Rules 7-11 and 79-5(d) and the Protective Order, I make this
12 declaration on behalf of the Irico Defendants to provide the basis for the Court to maintain under
13 seal certain excerpts of documents and information containing confidential personal employee
14 information.

15 4. Attached hereto are true and correct copies of Exhibits 16 and 20 to Defendants Irico
16 Group Corp. and Irico Display Devices Co., Ltd.’s Objections to Special Masters Report and
17 Recommendation on Plaintiffs’ Motion for Terminating Sanctions (ECF No. 6389).

18 5. Exhibit 16 contains a true and correct copy of IRI-CRT-
19 00031561_FTE_TRANSLATION–00031562_FTE_TRANSLATION, which is a certified English
20 translation of IRI-CRT-00031561-00031562, which contains Confidential personal information of
21 Irico’s former employee on page 2 of Exhibit 16 , IRI-CRT-00031561_FTE_TRANSLATION
22 (PDF page number 3), and page 4 of Exhibit 16, IRI-CRT-00031561 (PDF page number 5).

23 6. Exhibit 20 contains a true and correct copy of IRI-SU-000103E-000128E which is
24 a certified English translation of IRI-SY-000103-128, which contains Confidential personal and
25 medical information concerning Irico’s current and former employees on pages 5, 7, 8, 13-21, and
26 25-30 of Exhibit 20 , IRI-SU-000106E, IRI-SU-000108E, IRI-SU000109E, IRI-SU000114E–IRI-
27 SU-000119E, and IRI-SU-000123E–IRI-SU-000127E (PDF page numbers 12, 14, 15, 21-29, and
28 33-38), and pages 37, 39, 40, and 45-50, and 54-58 of Exhibit 20, IRI-SU-000106, IRI-SU-000108,

1 IRI-SU-000109, IRI-SU-000114–IRI-SU-000119, and IRI-SU-000123–IRI-SU-000126 (PDF
2 page numbers 44, 46, 47, 52-57, and 61-65).

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed this 10th day of July, 2024 in Houston, Texas.

5
6 /s/ Geraldine W. Young
Geraldine W. Young

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Declaration of Geraldine W. Young** was filed via CM/ECF on July 10, 2024, and as a result has been served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: Matthew Park
Matthew Park